Item 12

SUPPLEMENTAL
SUPPORTING DOCUMENT No. 3

Letter to the Permittees Regarding the Draft WQMP

A document presented to the Regional Board on June 10, 2004.

California Regional Water Quality Control Board
San Diego Region

Terry Tamminen
Secretary for Environmental Protection

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Arnold Schwarzenegge
Governor

June 2, 2004

Warren D. Williams, General Manager
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Dear Sirs:

SUBJECT: DRAFT WATER QUALITY MANAGEMENT PLAN FOR URBAN RUNOFF, RIVERSIDE COUNTY

At our request, the Santa Ana Regional Water Quality Control Board forwarded for our review, a copy of the draft document entitled, *Water Quality Management Plan for Urban Runoff, Santa Ana River Region, Santa Margarita River Region.*

We found the draft document to be consistent with most of the Standard Urban Storm Water Mitigation Plan (SUSMPs) requirements specified in tentative Order No. R9-2004-001 and concur with the comments on the draft WQMP provided by the Santa Ana Regional Board by letter dated May 28, 2004. You would need to make the following minor modifications to the draft WQMP to be in full compliance with the SUSMP requirements for the Santa Margarita River watershed.

1. The Permittees will need to clarify that the WQMP applies to both discretionary and non-discretionary projects. WQMP requirements are based on threat to water quality and type/category of development, not the discretionary status.

2. Section 1.0, Page 2 states that projects within the Santa Margarita River Region that do not have conditions of approval or map approval by the SUSMP compliance date in tentative Order R9-2004-001 will be required to develop a project specific WQMP. The Permittees, however, are required to ensure SUSMPs are included in projects (where feasible) upon adoption of the tentative Order. We will notify the Permittees that we

expect them to require post-construction structural BMPs through their DAMP and/or WQMP process until the SUSMPs are fully implemented.

3. Section 3.1, Page 5, The definition of Significant Redevelopment will need to be changed to include the replacement of structure of at least 5,000 square feet.

4. Section 3.3, Page 6 would need to include Environmentally Sensitive Areas as a development type for the Santa Margarita River Region.

5. Section 4.4, Page 9 includes three conditions (A, B, & C) that relieve a project of the requirement to address hydrologic conditions of concern within the WQMP. The Permittees will need to provide additional information on why these conditions would prevent increased downstream erosion and protect stream habitat.

6. Section 4.5.3.5, Volume Based Design appears to limit project proponents to using the unit basin storage volume to calculate the volume of runoff to be treated. We will point out to the Permittees that other methods for calculating the volume of runoff to be treated could be allowed to increase flexibility.

7. Section 4.5.3.5, Volume Based Design, A unit basin storage volume method would need to achieve 90% or more volume treatment not the 85% listed in the draft WQMP.

8. Section 4.5.4, Equivalent Treatment Control Alternatives allows off-site equivalent treatment BMPs if on-site treatment BMPs are determined to be infeasible or impracticable. This section appears to be allowing shared BMPs that treat runoff prior to discharge to receiving waters. Shared BMPs could be allowed under our Permit whether or not on-site structural BMPs are determined infeasible.

9. Section 5.0, Regionally –Based Treatment Control for installation of BMPs from development projects may result in non-compliance with Finding 18 and Section F.2.b.(3) of R9-2004-001. The WQMP would have to clearly specify that although structural treatment BMPs may be shared by multiple development projects, the BMPs must be installed at a location prior to discharge to a receiving water.

10. Section 7.0 Waiver of Treatment Control BMP Requirements allows elimination of structural treatment BMPs if site design and source control BMPs effectively eliminate pollutant discharges. R9-2004-001 does not allow for the waiver of structural treatment BMPs based only on site design and source control BMPs. However, Section F.2.b.4 does allow for an equivalent method for calculating volume or flow that must be treated. An equivalent method could include site design measures to reduce the amount of runoff that

must be treated structurally. In addition, a waiver of structural treatment BMPs is only allowed when all available BMPs have been considered and rejected as infeasible.

11. Exhibit F provides definitions that would need to be consistent with R9-2004-001.

As you can see with some minor modifications, the draft WQMP can also serve as the SUSMP required in the tentative Order No. R9-2002-001.

We appreciate your efforts in developing this important document and have noted that the Permittees are already requiring post construction treatment BMPs at some projects. We encourage the Permittees to continue their efforts to implement the SUSMP requirements to extent feasible during the 365-day implementation period. Please contact Eric Becker at (858) 492-1785 or email: becke@rb9.swrcb.ca.gov if you have any questions.

Respectfully,

Michael P. McCann, P.E.
Supervising Water Resources Control Engineer
San Diego Regional Water Quality Control Board

MPM:rwm:esb

cc: Michael Adackapara, Santa Ana RWQCB

File No. 10-7000.02

Item 12

SUPPLEMENTAL
SUPPORTING DOCUMENT No. 4

Letter from the Santa Ana Regional Board to the Permittees Regarding the Draft WQMP

A document presented to the Regional Board on June 10, 2004.

California Regional Water Quality Control Board

Santa Ana Region

Terry Tamminen
Secretary for Environmental Protection

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Arnold Schwarzenegger
Governor

May 28, 2004

Mr. Warren Dusty Williams, General Manager-Chief Engineer
Riverside County Flood Control and
Water Conservation District
1995 Market Street
Riverside, CA 92501

COMMENTS ON THE APRIL 2004 DRAFT OF WATER QUALITY MANAGEMENT PLAN – PREPARED UNDER ORDER NO. R8-2002-0011, NPDES NO. CAS618033, AREAWIDE URBAN STORM WATER RUNOFF

Dear Mr. Williams:

We have reviewed the April 30, 2004, draft of the Water Quality Management Plan (WQMP) for Urban Runoff prepared pursuant to Section VIII.B. of Order No. R8-2002-0011, NPDES NO. CAS618033, (Permit). We have the following comments:

1. Page 1, Section 1.0 Introduction, 1st paragraph (and elsewhere) – Please note that the WQMP should address all phases of new development/significant redevelopment projects; not merely post-construction urban runoff. We recognize that the main objective of the WQMP is to ensure that quality and quantity of urban runoff do not significantly change from pre-construction to post-construction. If appropriate control measures are considered and implemented during planning, construction and post-construction phases of the project, it is easier to achieve this objective.
2. Page 1, Section 1.0 Introduction, 1st paragraph - Please clarify if the project specific WQMP only applies to new/significant redevelopment categories identified in the Permit. If so, please specify that projects not in those categories shall comply with the Drainage Area Management Plan (DAMP), Supplement A, New Development Guidelines.
3. Page 1, Section 1.0 Introduction 4th paragraph – Please clarify in this paragraph what maps or permits during the development review and approval process require discretionary approval.
4. Page 3, Section 2.1, Overview continued, 1st paragraph - The statement "Other development projects will be required to incorporate site design BMPs and source control BMPs through Co-permittee conditions of approval or permit conditions in accordance with the applicable DAMP" is unclear. Please clarify what are the "other development projects" and what procedures specified in the

DAMP are applicable to these projects. Please provide a distinction between projects required to prepare a WQMP (those specified in the Permit) and other projects required to comply with DAMP, Supplement A.

5. Page 4, Section 2.3 Implementation of WQMP Requirements – Please indicate that the municipalities, upon approval of the WQMP, will prepare a local implementation procedure that describes the responsibilities of each title/position within each department in the WQMP review and approval process. Training and education for staff that will be implementing this requirement should be described in this procedure.
6. Page 4, Section 2.3 Implementation of WQMP Requirements, Table 1 – This table is incomplete.
7. Page 5, Section 3.0 Projects requiring a Project-Specific WQMP – "In addition, all projects must comply with Section 6, Development Planning, of the DAMP." As with Comment 2, above, please clarify the reference to "all projects". Describe the procedure to be followed for those "other projects".
8. Page 5, Section 3.1, Significant Redevelopment – Please note that if the redevelopment results in an increase of more than fifty percent of the impervious surface, then a WQMP is required for the entire development.
9. Page 8, Section 4.1 Project Description, fourth bullet - Please consider the following modification: "The watershed in which the project is located (Santa Ana or Santa Margarita), sub-watershed (Salt Creek, San Jacinto, Warm Springs, Temescal, etc.) and Reach (found in Table 3-1 of the Water Quality Control Plan for the Santa Ana River Basin - Basin Plan)".
10. Pages 8 and 9, Section 4.2, Site Characterization - Add a bullet to require a summary of a Phase 1 site assessment to identify potential hazardous substances release at the site if one is prepared or required for that site. Include a summary of any remediation conducted and site use restrictions if any.
11. Page 9, Section 4.3 Identify Pollutants of Concern – Please add that site-specific conditions must also be considered as potential pollutant sources, such as legacy pesticides or nutrients in site soils as a result of past agricultural practices or hazardous substances in site soils from industrial uses. Sites that have been properly remediated may not pose a current threat or a future threat to storm water quality.
12. Page 9, Section 4.3, Identify Pollutants of Concern – There are a number of 303(d) listed water bodies within the permitted area. Please add the following language (excerpted from SB and OC WQMPs).

    "To identify pollutants of concern in receiving waters, each project proponent preparing a project-specific WQMP shall, at a minimum, do the following:

    a. For each of the proposed project discharge points, identify the proximate receiving water for each point of discharge and all downstream receiving waters, using hydrologic unit basin numbers as identified in the most

recent version of the Water Quality Control Plan for the Santa Ana River Basin.

b. Identify each proximate and downstream receiving water identified above that is listed on the most recent list of Clean Water Act Section 303(d) (CWA 303(d) list, Exhibit ___, Table___) impaired water bodies. List all pollutants for which the receiving waters are impaired.

c. Compare the list of pollutants for which the receiving waters are impaired with the pollutants expected to be generated by the project (as discussed in Part 1, above).

Potential pollutants identified in Table __ require an offset if the potential pollutant is also identified as a pollutant causing or contributing to an impairment of water quality standards. Pollutants requiring an offset are those on the State's most recently approved CWA 303(d) list. The discharge of any listed pollutant to an impaired water body on the CWA 303(d) list shall require an offset (e.g., no net loading) for any additional loading from the proposed project to ensure no further degradation of the impaired water body. Exhibit __, Table __ contains a list of CWA 303(d) list impaired water bodies and the pollutants attributed to these impairments."

13. Pages 9 and 10, Section 4.4 Identify Hydrologic Conditions of Concern – Please explain and demonstrate how Condition A, B, or C does not present hydrologic conditions of concern.
14. Page 10, Section 4.4 Identify Hydrologic Conditions of Concern, 1st paragraph after Condition C - This paragraph does not mirror those parameters under Methodology A and does not provide sufficient guidance to assess hydrologic impacts required under Methodology B.
15. Page 10, Section 4.4 Identify Hydrologic Conditions of Concern - Methodology A.
    a. It is not clear if items 1-5 all must apply or any one may apply.
    b. This method only attempts to mitigate the peak flow rate increase with development. Please explain how this will address changes in other flow characteristics such as flow velocity, runoff volume, time of concentration, and flow duration.
    c. It should be made clear that this control measure is in addition to site design, source control, and/or other treatment control BMPs.
16. Page 10, Section 4.4 Identify Hydrologic Conditions of Concern - Methodology B. This methodology does not provide sufficient guidance on how project proponents may conduct a hydrologic impact assessment.
17. Page 12, Table 2, Site Design BMPs

a. Provide a reference section where site design BMPs may be found in the WQMP, i.e., (see Section 4.5.1).
b. This table states that site design BMPs are to be implemented to the extent practicable. Other than those noted in the footnotes, please determine if any of these site design principles contradict existing ordinances and identify if there are institutional impediments that discourage plan reviewers from approving reduction in connectedness, narrowing of streets, narrowing of sidewalks, elimination of curbs, etc.

18. Page 12, Table 2 – Some of the BMPs listed in Supplement A are not shown on Table 2. Please add or explain why they should be dropped.
    a. Non-structural BMPs – Spill contingency plan.
    b. Structural BMPs – Inlet trash racks.
19. Page 12, Table 2, Treatment Control BMPs – Provide a reference section where treatment control BMPs and waiver provisions are found in the WQMP.
20. Page 12, Table 2 - Typing error "Common Area Litter Control" is repeated.
21. Page 13, Section 4.5.1, Site Design BMPs – Please add the following paragraph at the end of the last bullet: "These same practices, because they reduce the volume and usually the rate of runoff, also have the benefit of reducing the amount of storm water that must be treated before being discharged or to be treated in regional facilities. These design principles offer an innovative approach to urban storm water management by uniformly or strategically integrating storm water controls throughout the urban landscape. Resources for applying these principles include Start at the Source (Bay Area Storm water Management Agencies Association, 1999), and Low Impact Development Design Strategies, An Integrated Design Approach (Prince George's County, Maryland; Department of Environmental Resources, 1999)."
22. Page 13, Section 4.5.1, Site Design BMPs
    a. Site Design Concept 1, first Bullet – Please add the following paragraph under maximize the permeable area:
    "Runoff from developed areas may be reduced by using alternative materials or surfaces with a lower Coefficient of Runoff, or "C Factor". The C factor is a representation of the ability of a surface to produce runoff. Surfaces that provide higher runoff volumes are represented by higher C factors. By incorporating more pervious, lower C factor surfaces into a development, lower volumes of runoff will be produced. Lower volumes and rates of runoff translate directly to lowering treatment requirements.
    b. Site Design Concept 1, fourth bullet – It states that landscaped buffer can be incorporated between sidewalk and street. It is not clear if the vegetated buffer is to filter the runoff from the house onto the street or runoff from the street. To treat street runoff, which is the recommended way, that area should be at the same level as the street

or lower. This concept is discussed in site design concept 2. The two concepts should be more clearly differentiated.

23. Pages 15 and 16, Section 4.5.2.1 – Non-Structural Source Control
    a. Education/Training for Property Owners, second paragraph, last sentence – Missing preposition "... at the time of occupancy." Also, this paragraph refers to a resources list of educational materials. Unless this list of educational materials varies for each permittee, the current list should be included as an attachment to this guidance, preferably grouped into appropriate categories, such as residential, retail commercial, vehicle-related commercial, industrial, etc.
    b. Education/Training for Property Owners third paragraph - "For Projects where employees are required to perform activities that may impact the quality of urban runoff, BMP training and education programs must be provided to all new employees at the time of hire and annually thereafter."
    c. Activity Restrictions, third bullet: "Prohibit vehicle washing, maintenance, or repair on the premises or restrict those activities to designated areas (such as inside garages for repairs and on lawns for washing vehicles)."
    d. Page 15, Irrigation System and Landscape Maintenance, 1st sentence – This refers to Co-Permittee's water conservation ordinance. Please state how project proponents may access this information.
    e. Common Area Litter Control – "...For industrial/commercial Projects (including apartments) and for Projects with HOAs/POAs, the project-specific WQMP must address... or HOAs/POAs for investigation, and identification of the party responsible for litter control."
    f. Street Sweeping Private Streets and Parking Lots – "For industrial/commercial Projects and for other Projects with HOAs/POAs, the frequency of sweeping privately owned streets shall be described in the project-specific WQMP. The frequency shall be no less than the frequency of street sweeping by the Co-Permittee on public streets. For Projects with parking lots, the parking lots shall be swept at least quarterly, including just prior to the start of the rainy season. The project-specific WQMP should identify the anticipated sweeping frequency, source of funding and the party responsible for conducting the periodic sweeping."
24. Section 4.5.2.2 Structural Source Control BMPs
    a. Page 18, Protection of Slopes and Channels, second bullet – The bullet item states that riprap should be used to avoid erosion where outlets of storm drains into channels. Ripraps, if not properly designed, may cause mosquito breeding and riprap may not be the best alternative for multiuse facilities. Please consider describing other viable alternatives such as turf reinforcement mat (TRM) planted with appropriate vegetation. Also, please add the following language at the end of this paragraph: "Other methods of managing flow velocity and volume must be considered. A useful reference for

alternative methods is: A Primer on Stream and River Protection for the Regulator and Program Manager," by Ann L. Riley, San Francisco Regional Board. The primer can be accessed on the internet at www.swrcb.ca.gov/rwqcb2/Agenda/04-16-03/Stream%20Protection%20Circular.pdf."

b. The next bullet item describes ways to stabilize a channel under conditions not suitable for grassy lining. The three alternatives described include concrete soil, geo-grid and riprap. The alternatives must be based on a consideration of fluvial geomorphology and bioengineering techniques.
c. Please move the paragraph entitled "Provide Community Car Wash Racks" on page 20 to before the paragraph on properly design fueling areas on page 18. Similarly on Table 2, page 12, please make the corresponding move under structural BMPs. This BMP could be easily overlooked in its current position after the commercial/industrial BMPs.
d. Page 18, Properly Design Fueling Areas, item 5 –
    i. Please revise as follows: The fuel dispensing area must be designed to prohibit spills from draining to the street, ~~or~~ storm drain system, or offsite. Also, please add the following sentence: "Spills must be cleaned up in accordance with a Spill Contingency Plan."
    ii. Please specify that any trucking facilities should also have the proper grades to avoid fuel spill runoff. Please specify that all drain inlets for unmanned fueling facilities must have fuel/water separators.
e. Pages 19 and 20, Properly Design Outdoor Material Storage Areas – S8 of Supplement A requires that "For commercial outdoor vehicle and equipment salvage yards, and commercial outdoor recycling, the entire storage area shall drain through water quality inlets." Please add this or explain why this requirement is not applicable.

25. Page 20 and 21, Section 4.5.3, Treatment Control BMPs
    a. Page 20, second paragraph - Add the following as the first sentence" "For identified pollutants of concern that are causing impairment in receiving waters, the project WQMP shall incorporate one or more Treatment Control BMPs of medium or high effectiveness in reducing those pollutants."
    b. We recommend placing the information referenced to be in Exhibit C within this section as well.
    c. Page 21, last paragraph - Footnote 12, page 13 regarding hillside grading ordinances that limit or restrict infiltration of runoff applies to this paragraph also.
    d. Page 22 Section 4.5.3.2, Extended Detention Basin - Please state that the forebay should be concreted and is a critical area for regular maintenance and debris removal. The forebay should drain within two hours so that nuisance flows will be able to dry out from daily irrigation overflows.

Alternatively, inlet filters may be useful for pretreatment into an extended detention basin. Although highly permeable soils may cause groundwater pollution, that is not likely if appropriate source controls are implemented and if the groundwater is deep. Thus, highly permeable soil is preferred, up to a limit, so that nuisance flows don't cause puddles. In fact, if the soil is not permeable enough, it may be necessary to install under drains to minimize puddling. Please specify that hydrophytic plants be used in the low areas of the basin as such plants may absorb dissolved pollutants. Please discuss how low flows may be shunted into the pond and allow high flows to bypass the basin to prevent the first flush from being washed out of the basin.

26. Page 25, Section 4.5.3.4 Flow-Based Design – The CASQA Handbook has flagged use of the rational formula in certain situations as "Caution, High Caution, and Not Recommended". Please identify an alternative calculation method for those situations. Please provide sample calculations.
27. Pages 25 and 26, Volume-Based Design
    a. First and second bullets – Please define how the tributary area is determined. Please reconcile that with the definition in the ASCE/WEF Manual, which is based on watershed.
    b. Third bullet – This refers to Exhibit Z but should be Exhibit D. Please revise.
    c. Please provide sample calculations.
28. Page 26, Section 4.5.4 Equivalent Treatment Control Alternatives – Please add the following items:
    a. Off-site Treatment Control BMPs shall not cause water quality impairment or increase loading of pollutants of concern or contribute to an exceedance of water quality objectives.
    b. Off-site Treatment Control BMPs shall not be placed in a natural waterway.
29. Page 62, Appendix A – The design volume curve referenced in page 3 of the Riverside County Storm Water Quality Best Management Practice Design Handbook was not accessible in our electronic copy.
30. Pages 26 and 27, Operation and Maintenance
    a. Add a bullet, which states as follows: Signed statement (with date) accepting responsibility for maintenance, repair, replacement, and inspection of BMPs. O&M agreements must be transferred to future site owners as described in Section 6.2.
    b. Please include a discussion of various acceptable long-term operation and maintenance mechanisms. Include these options in the WQMP template for the project proponent to choose.
31. Page 28, Section 4.8 WQMP Certification – The certification statement in this section differs from the version in the template. Both versions lack accountability to the city such as the necessary city/county notification in the event of a property (and WQMP responsibility) transfer and lacks a certification under penalty of law

clause. Please refer to the SB County WQMP (June 01, 2004) certification language.

32. Page 29, Section 5.0 Regionally-Based Treatment Control
    a. Please add the following text (excerpted from the San Bernardino and OC WQMP).
        - One or more Agencies (or, in some cases another agency) has prepared a regional or watershed plan to determine where on-site and/or regional or watershed Treatment Control BMP facilities are appropriate and it has been approved by each Agency intending to utilize the Treatment Control BMP facilities as part of the new development/significant redevelopment program. During the term of the Permit, the Executive Officer, after notice to interested parties, must make a determination that the regional or watershed treatment BMP exceeds the water quality solution provided by the onsite structural BMPs otherwise required by section XII. B. 3 of the Permit and is otherwise consistent with the Permit and the Clean Water Act. The request for determination should be made as early in the design process as possible.

        - The BMPs in a regional or watershed program with impaired waterbodies and/or watersheds subject to Total Maximum Daily Loads are to address the applicable implementation requirements of any adopted TMDLs.

33. Page 30, Section 6.2 – Changes in Site Ownership – There should be a mechanism to ensure continuity, via a binding agreement, for operations and maintenance of control measures, access to facilities and for funding. Please refer to the template in San Bernardino County's WQMP, Attachment A-2.
34. Page 30, Section 7.0 Waiver of Treatment Control BMP Requirements - Please consider moving the last sentence in the second paragraph on page 30 as a separate paragraph at the end of the section.

    "Co-Permittees shall notify the Executive Officer of the Regional Water Quality Control Board by Certified Mail (with Return Receipt) within thirty (30) calendar days after issuing a waiver. The notification shall include a copy of the waiver documentation and a copy of the Project's WQMP."
35. Page 6, Project-Specific Water Quality Management Plan, Section V.1 Site Design BMPs - Please provide some design guidelines as subcategories in Table 1, to facilitate incorporation of these site design BMPs. We suggest the format presented in the San Bernardino WQMP template, Attachment A, pages 1-10 to A-14.
36. Page 3 of Exhibit A, Section II, Site Characterization - This section states that if an infiltration BMP is utilized, then a soils report must be included. This report

should identify the soil type(s), infiltration capacity of the soils at the final grade bottom of the infiltration BMP and any available information pertaining to the depth to groundwater beneath the site. These conditions should be included with the sixth bullet item in Section 4.2.

37. Page 8 of Exhibit A, Section V.3 - Table 3 has a limited number of treatment control BMPs. We are concerned that only having a limited number of BMPs in the table might discourage the use of other BMPs. We would like to see other commonly used BMPs listed, including inlet filters, constructed wetlands, etc.
38. Page 10 of Exhibit A, Section VI – It may be appropriate to require a short description of the needed operations and maintenance of the chosen devices here or elsewhere in the WQMP.
39. Page 11 of Exhibit A, Section VII, Funding – Please indicate that sources of funds and funding mechanism should be identified and any agreements for funding should be included with the WQMP.
40. Page C-1, Treatment control BMP Selection Matrix – It may be appropriate to indicate that constructed wetlands have high/medium removal efficiency for bacteria.
41. It may be useful for the project proponents to have sample calculations and/or sample completed WQMPs.

If you have any questions, please contact Mr. Keith L. Elliott at (909) 782-4925, or Mr. Michael Roth at (909) 320-2027.

Sincerely,

Michael J. Adackapara
Division Chief

Cc: Riverside County MS4 Permit Interested Parties List (see attached list)
NPDES Santa Ana/Santa Margarita Technical Committee (By e-mail)

Riverside County MS4 Permit Interested Parties List

USEPA – Eugene Bromley
*State Water Resources Control Board – John Youngerman/Bruce Fujimoto
*California Regional Water Quality Control Board, Colorado River Basin Region (7) – Abdi Haile (haila@rb7.swrcb.ca.gov) /Pat Garcia (garcp@rb7.swrcb.ca.gov)
*California Regional Water Quality Control Board, San Diego Region (9) – Bob Morris (morrb@rb9.swrcb.ca.gov) / Dave Gibson (gibsd@rb9.swrcb.ca.gov) / Elizabeth Lair
Environmental Organizations
*Defend the Bay – Bob Caustin
*Heal the Bay – Garry Brown
*Lawyers for Clean Water – Daniel Cooper
*Lawyers for Clean Water – Kim Lewland
Natural Resources Defense Council (NRDC) – David Beckman
Other
* Building Industry Association – Tim Piasky/David Smith
* Latham & Watkins – Paul Singarella
* Best, Best, and Krieger – Anne Thomas
Sempra Engery – San Diego – Scott Koken
Western States Petroleum Assoc – Ronald R. Wilkniss
Fred Peters
Manatt – Christine Diemer Iger/Craig Moyer

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